



Limestone District School Board (LDSB) is committed to fostering a culture of integrity, accountability, transparency, ethical conduct and ethical decision making. Limestone District School Board trustees, staff, volunteers, and third-party service providers are expected to act with honesty and integrity while fulfilling their duties and responsibilities and comply with all applicable laws and regulations, including guidelines established by their professional colleges and associations.

Employees have a responsibility to report concerns regarding suspected wrongdoing so that issues may be addressed promptly and appropriately.

The Board encourages employees to raise concerns in good faith and without fear of reprisal. Reports made under this administrative procedure will be treated seriously, investigated impartially, and handled in a manner that protects confidentiality to the greatest extent possible, while ensuring procedural fairness.

Purpose

The purpose of this Administrative Procedure is to:

- Encourage the reporting of suspected wrongdoing.
- Establish a safe and confidential reporting process.
- Protect individuals who make disclosures in good faith from reprisal.
- Ensure allegations are reviewed promptly, fairly, and objectively.
- Reinforce the Board's commitment to ethical governance and responsible stewardship of public resources.

Scope

This policy applies to all Board employees. Nothing in this procedure limits an individual's

Limestone District School Board

Limestone District School Board is situated on traditional territories of the Anishinaabe & Haudenosaunee.



obligation to report matters required under legislation.

Wrongdoing

Examples of wrongdoing include, but are not limited to:

- Misuse or misappropriation of Board funds, property or assets.
- Fraud, theft, or financial mismanagement/irregularities.
- Serious breaches of Board policies, administrative procedures, applicable legislation, or regulatory requirements.
- Falsification of records or documents.
- Significant conflicts of interest.
- Unlawful conduct.
- Actions creating a substantial risk to health, safety, the environment, or Board operations.
- Deliberate concealment of any of the above.

This procedure is not intended to replace established complaint or grievance processes related to human resources matters, human rights matters, collective agreements, student issues, or workplace conflict where other Board procedures apply.

Responsibility to Report

Employees are encouraged and expected to report any suspected wrongdoing and/or concerns as soon as reasonably possible in good faith and disclosure should be based on information that the discloser reasonably believes to be credible and relevant to the matter being reported. Wherever possible, disclosures should be based on the discloser's direct, first-hand knowledge or observations.



Where information is based on second-hand knowledge, the discloser should clearly identify it as such and provide sufficient information to enable the circumstances, source, or underlying facts to be verified, where reasonably possible. The discloser should distinguish between facts of which they have direct knowledge and information they have received from others or believe to be true.

An individual who discloses suspected wrongdoing is not expected to have conclusive evidence or to establish that wrongdoing has occurred before making a disclosure. Disclosures should however contain sufficient factual information, where available, to permit an appropriate assessment or review of the concern.

Reports should be submitted through the confidential [Protected Disclosure Reporting Form](#).

Where the alleged wrongdoing pertains to the Chief Executive Officer, reports shall be made directly to the AuditCommitteeChair@limestone.on.ca. In such instances, the Chief Executive Officer will not have any involvement in the investigation process save and except to respond to the allegations.

Anonymous disclosures may be considered where sufficient information is provided to allow for meaningful review and investigation.

Acknowledgement and Initial Review

Where contact information is provided, the Board will acknowledge receipt of a disclosure within a reasonable period of time. The disclosure will be reviewed to determine whether it falls within the scope of this procedure, whether immediate action is required, and whether the matter should proceed to investigation, be referred to another Board process, or be referred to an external authority.

Confidentiality

The Board will make every reasonable effort to maintain confidentiality throughout the disclosure and investigation process, subject to the following:

- Principles of procedural fairness.



- Legal requirements.
- The Municipal Freedom of Information and Protection of Privacy Act. Obligations to disclose information where required during an investigation, legal proceeding, regulatory process, or other process authorized by law.

Protection from Reprisal

No employee shall suffer reprisal for making a protected disclosure in good faith or participating in an investigation.

Reprisal includes, but is not limited to:

- Intimidation.
- Threats.
- Discrimination.
- Harassment.
- Disciplinary action without cause.
- Adverse employment consequences.
- Any action intended to discourage reporting.

Any substantiated reprisal may result in disciplinary action up to and including termination from employment, or other appropriate action.

False or Bad Faith Allegations

Employees are expected to make disclosures honestly and in good faith. Knowingly making a false, malicious, or vexatious allegation for the purpose of causing harm to another person constitutes misconduct and may result in disciplinary action up to and including termination from employment, or other appropriate action.



A disclosure that is unsubstantiated and/or lacking in adequate evidence following investigation does not, in itself, constitute a false allegation.

Investigation

The Chief Executive Officer, or designate, shall ensure disclosures are assessed promptly to determine the appropriate response.

Investigations shall:

- Be conducted fairly and impartially by an internal or external investigator as deemed appropriate.
- Respect the rights of all individuals involved.
- Maintain confidentiality where possible.
- Be appropriately documented.
- Result in corrective action, where warranted.

Where appropriate, matters may be referred to law enforcement, regulatory agencies, or other authorities.

All LDSB employees have a duty to cooperate in an investigation, including being interviewed as well as producing any records, such as emails, text messages, phone messages, social media posts, videos or other documents relevant to an investigation.

All disclosure files shall be handled confidentially, maintained securely, and protected from unauthorized access.

Responsibilities

The Chief Executive Officer shall:

- Oversee and implement this administrative procedure.



- Ensure disclosures are investigated appropriately and in a timely manner.
- Report to the Board, where appropriate and/or required, while maintaining confidentiality.

Supervisors shall:

- Ensure no reprisal occurs.

Employees shall:

- Report suspected wrongdoing in good faith.
- Cooperate fully with investigations where requested.

Related Documents

Administrative Procedure 146 – Digital Citizenship

Administrative Procedure 403 – Conflict of Interest

Administrative Procedure 405 - Understanding Harassment and Discrimination

Administrative Procedure 406 – Reporting Harassment & Discrimination

Administrative Procedure 415 – Employee Progressive Discipline

Administrative Procedure 430 – Outside Employment/Private Practice

Administrative Procedure 497 – Public Concern & Issue Resolution Process

Administrative Procedure 553 – Fraud Reporting

Board Policy 5 – Trustee Code of Conduct

Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)

Ontario Occupational Health & Safety Act (OHSA)